

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re the matter of:

NO. 21 B 09818

Ling Chen

Judge LaShonda A. Hunt

Debtor(s)

Ch. 7 (Joliet)

NOTICE OF MOTION

TO:

Ling Chen
2940 Stonewater Drive
Naperville, IL 60564
Via regular mail

David M. Siegel
Via electronic notification

Zane Zielinski
Via electronic notification

PLEASE TAKE NOTICE that on December 3, 2021, at 9:15 a.m., I will appear before the Honorable LaShonda A. Hunt, Bankruptcy Judge, or any judge sitting in that judge's place, and present the Motion of First Midwest Bank, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **161 165 5696** and the password is **7490911**. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Christopher H. Purcell
112 Cary Street
Cary, Illinois 60013
Shermlaw13@aol.com
Phone: (312) 372-1487

FIRST MIDWEST BANK

By: /s/ Christopher H. Purcell
One of its Attorneys
Sherman & Purcell, LTD.

CERTIFICATE OF SERVICE

I, Christopher H. Purcell, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on November 16, 2021 before the hour of 5:00 p.m.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re the matter of

Ling Chen

Debtors.

CHAPTER 7 (Joliet)

NO. 21 B 09818

Judge Pamela S. Hollis

MOTION TO EXTEND THE DEADLINE FOR OBJECTIONS
TO DISCHARGE & DISCHARGE-ABILITY

Now comes FIRST MIDWEST BANK, a creditor herein, by Sherman & Purcell, LTD., its attorneys, and moves this Honorable Court for entry of an Order extending the deadline for objections to discharge and discharge-ability, and in support thereof respectfully represents as follows:

1. First Midwest Bank is a creditor of the Debtor. The debtor entered into a promissory note for a principal amount of \$30,000 on or around April 28, 2028. It appears the payments were to start on May 28, 2021 but the debtor appears to have reversed all of the payments so that no payments were made.

2. The Debtor filed their petition for relief on August 22, 2021, between 90-120 days after taking out the loan.

3. The debtor appears to have entered into a loan with Sofi Lending Corporation, but it is not clear when the approximately \$24,732 was borrowed.

4. The Trustee, Zane Zielinski, has requested certain bank records, etc. from the debtor, by and through debtor's counsel. Counsel for First Midwest Bank would also ask for those records.

5. First Midwest Bank requires an opportunity to further investigate and / or to file an objection to discharge of the debt owed to First Midwest Bank and / or to the Debtor's discharge.

6. The objections to discharge date is currently set for September 30, 2019. The objected to discharge date has already been extended previously. Further investigation is

required to determine if an adversary to object to discharge or dischargeability of the Debt owed to First Midwest Bank should be brought.

7. The deadline for filing objections to discharge is November 22, 2021 and this motion to extend was brought prior to that deadline.

8. That FIRST MIDWEST BANK requests that the deadline for filing objections to discharge until January 18, 2022 to allow FIRST MIDWEST BANK the opportunity to further investigate and / or to file an objection to the discharge of the debt owed to First Midwest Bank and / or to the Debtor's discharge.

WHEREFORE, FIRST MIDWEST BANK prays that this Honorable Court enter an Order extending the deadline to object to the discharge under § 727 and / or to determine discharge-ability of the debt owed to FIRST MIDWEST BANK under § 523 to and including January 18, 2022, and for such other and further relief as this Court may deem just.

Christopher H. Purcell
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FIRST MIDWEST BANK

BY: /s/ Christopher H. Purcell
One of its Attorneys